

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

JOHN DOE,)	
)	
Plaintiff,)	Case No. 4:18cv3142
)	
v.)	
)	
UNIVERSITY OF NEBRASKA,)	NOTICE OF RULE 30(b)(6) DEPOSITION OF
)	UNIVERSITY OF NEBRASKA
UNIVERSITY OF NEBRASKA BOARD)	
OF REGENTS,)	
)	
Defendants.)	
_____)	

PLEASE TAKE NOTICE that pursuant to FRCP 30(b)(6), Plaintiff John Doe, by and through its undersigned counsel, will take the deposition upon oral examination of the person(s) designated by the University of Nebraska, 1400 R St., Lincoln, Nebraska 68588 with respect to the topics set forth below. The deposition will take place at 9:30 a.m. on August 26, 2020, at 1400 R St., Lincoln, Nebraska 68588 before a Notary Public or other person authorized by law to administer oaths. The deposition will be conducted by videoconference and videotaped. You are invited to attend and cross-examine.

Plaintiff reserves the right to seek relief from the court in the event that the designated deponent is not properly prepared to testify on behalf of the University of Nebraska with respect to each of the identified topics.

RULE 30(b)(6) TOPICS

1. The allegations reported to UNL by Jane Roe against Plaintiff, UNL's investigation of the allegations, and UNL's response to the allegations.
2. The allegations reported to UNL by Plaintiff against Jane Roe, UNL's investigation of the allegations, and UNL's response to the allegations.
3. The administrative hearing conducted on May 31, 2018, with Plaintiff as Respondent, and the pre-hearing conferences.
4. The evidence relied upon by UNL to justify its sanctioning of Plaintiff.
5. UNL's administrative hearing procedure for cases involving allegations of sexual assault.
6. UNL's Institutional Equity and Compliance office, its structure, and its policies.

7. Resources offered by UNL to complainants and respondents in cases with allegations of sexual assault.
8. UNL's response and reaction to the 2011 "Dear Colleague" letter.
9. UNL's Student Code of Conduct, Appendix A.
10. Training required of the administrative hearing panel members who decided Plaintiff's case.
11. Sanctions that have been imposed by UNL against students found to have committed sexual assault under the Student Code of Conduct in the last 5 years.
12. The sanctions that were imposed on Plaintiff, who participated and made the decision to impose the sanctions.
13. Defendants' responses to Plaintiff's interrogatories.

[SIGNATURE PAGE FOLLOWS]

Dated: August 6, 2020

Submitted by:

JOHN DOE, Plaintiff

/s/ Matthew J. Donnelly

Matthew J. Donnelly

KS Bar # 23354

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Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case. I further certify that the foregoing was emailed to the following:

Susan K. Sapp ssapp@clnewilliams.com

Lily Amare lamare@clnewilliams.com

Bren H. Chambers bchambers@nebraska.edu

Counsel for Defendants

/s/ Matthew J. Donnelly

Matthew J. Donnelly